

WORKFORCE MEMBERS SECURITY PROCEDURES

The Los Angeles County Department of Mental Health Chief Information Officer (LACDMH CIO) or his/her designee must work with System Managers/Owners and the LACDMH Human Resources Bureau (HRB) to develop and coordinate implementation of the workforce security procedures.

I. LACDMH Workforce Authorization and Supervision Procedure

LACDMH System Managers/Owners must ensure that Workforce Members are granted access authorization in accordance with LACDMH Policy No. 551.01, Information Access Management.

The authorization and supervision process must consist of all the following components:

1. LACDMH Managers/Supervisors must identify and supervise Workforce Members who work with or have access to Protected Health Information (PHI) and other confidential information. LACDMH Managers/Supervisors must identify the minimum information access required by these Workforce Members to do their job.
2. LACDMH System Managers/Owners or designees must identify the security levels necessary for securing the system and still allowing Workforce Members to perform their jobs. LACDMH System Managers/Owners will assign Workforce Members to the minimum-security level that they need to perform their job function.
3. LACDMH Managers/Supervisors must restrict access to PHI and other confidential information by unauthorized Workforce Members.
4. LACDMH Managers/Supervisors must provide authorization and supervision to Workforce Members and others who need to be in areas where PHI and other confidential information may be accessed, and take appropriate safeguards to ensure that those who may be exposed to PHI and other confidential information are made aware of the policies protecting that information.

II. LACDMH Workforce Clearance Procedure

LACDMH System Managers/Owners must ensure that Workforce Members' access to PHI and other confidential information is limited to the minimum necessary to perform their job responsibilities.

The clearance process must consist of all of the following components:

1. LACDMH System Managers/Owners or designee must work with LACDMH HRB to ensure that proper workforce clearance procedures are implemented.

2. LACDMH System Managers/Owners or designee must ensure that all applications for access to a system are complete and approved by the appropriate workforce Managers/Supervisors. LACDMH System Managers/Owners must also ensure that each Workforce Member with access has signed an acknowledgment of the LACDMH Policy No. 556.01, LACDMH Acceptable Use for County Information Technology Resources, which defines their responsibility for the protection of the confidentiality, integrity, and availability of all LACDMH information resources and the restrictions for utilizing those resources.
3. LACDMH HRB must ensure that each new Workforce Member receives and signs acknowledgment of LACDMH Policy No. 556.01 during the initial hiring orientation and that each Workforce Member completes the acknowledgment during the annual Performance Evaluation process. Signed acknowledgments will be filed in the Workforce Member's official personnel folder.

III. LACDMH Workforce Termination Procedure (Access)

LACDMH System Managers/Owners must ensure that departing Workforce Members' access to all PHI and other confidential information is terminated upon termination of employment.

The termination process must consist of all the following components:

1. The LACDMH System Manager/Owner must be notified by the Workforce Member's supervisor as soon as possible, but in no circumstance later than the day the Workforce Member's employment or other service arrangement with LACDMH ends.
2. The LACDMH System Manager/Owner must terminate the Workforce Member's access to PHI or other confidential information upon notification by the Workforce Member's supervisor when the Workforce Member terminates employment or transfers to another LACDMH facility or County department. Access termination must be:
 - a. As soon as possible, but in no circumstance later than 5 business days when the end of employment is voluntary.
 - b. As soon as possible, but in no circumstance later than close of the same business day or end of Workforce Member's work shift when the end of employment is involuntary.
3. The Workforce Member's supervisor must notify the LACDMH System Manager/Owner when a Workforce Member's status/function/responsibility has changed. The System Manager/Owner must promptly review the Workforce Member's access to PHI and other confidential information and must modify the member's access as needed.